

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE: ANC RENTAL CORPORATION, et al.

Bankruptcy Case No. 01-11200

Debtors

ANC RENTAL CORPORATION, et al.

Appellant

Civil Action No. 04-1430

v.

DALLAS COUNTY, ET AL.

Appellees

**APPEAL FROM THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE
HONORABLE MARY F. WALRATH**

**APPELLANT'S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE BRIEF**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Appellants ANC LIQUIDATING TRUST, (Appellants), pursuant to the Federal Rules of Bankruptcy Procedure and Local Rules of Civil Practice and Procedure of this Court, and respectfully move for an extension of time to file its Brief herein, and in that connection, would show the following:

1. This is Appellant's first request for an extension of time to file the Appellant's Brief.

2. On October 8, 2004, the United States Bankruptcy Court for the District of Delaware issued a Memorandum Opinion and signed an Order in Bankruptcy Case No. 01-11200, In Re: ANC Rental Corporation, et al., Adversary Proceeding No. 04-51204, ANC Rental Corporation, et al. v. Dallas County, et al. Appellant ANC Rental Corporation appealed from the Order in this case.

3. The Appellant perfected this appeal by filing its Notice of Appeal on October 18, 2004. Following mediation of this matter, the dispute remaining unresolved, the Court approved a Stipulation and Order Re Post-Trial Briefing Schedule dated July 1, 2005. (the ABriefing Schedule s).

4. Pursuant to the Briefing Schedule, Appellant's brief is due to be filed on July 22, 2005.

5. Appellants' counsel of record has, over the last several weeks leading up to the current filing deadline, been required to devote significant time and attention to several other pending legal matters in which this firm is involved. Each of these cases has unavoidably consumed substantial amounts of counsel's available time, and delayed completion of Appellant's Brief herein.

6. As a result, Appellant respectfully requests an additional twenty-one (21) days in which to complete and file Appellant's Brief, with similar extensions of the deadlines for filing of Appellees' Brief and Appellant's Reply Brief thereafter.

7. The undersigned attorney for Appellant has conferred with Appellees' attorneys and confirmed that this motion is unopposed by all appellees.

WHEREFORE, Appellant respectfully requests that the Court extend the filing deadline for Appellant's Brief to August 12, 2005, with Appellees' Briefs thereafter due on September 9, 2005, and Appellant's Reply Brief on September 30, 2005.

Dated: July 21, 2005.

Respectfully submitted,

/s/ Joseph Grey

Joseph Grey (No. 2358)

Thomas G. Whalen, Jr. (No. 4034)

STEVENS & LEE, P.C.

1105 North Market Street, 7th Floor

Wilmington, DE 19801

Telephone: (302) 654-5180

Telecopier: (302) 654-5181

J.M. HARRISON & ASSOCIATES

1035 C Street, Suite 200

Floresville, Texas 78114-2223

Telephone: (830) 393-0500

Telecopier: (830) 393-4941

ATTORNEYS FOR APPELLANTS